FILED

2016 DEC 19 PM 3:30

BY ______ DEPUTY

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

UNITED STATES OF AMERICA,	§	
	§	
Plaintiff,	§	
	§	
v.	§	**NO. EP-15-CR-01245-DCG(2)**
	§	
IRMA VIVIANA LARA,	§	
	§	
Defendant.	§	

GOVERNMENT'S MOTION TO DETAIN DEFENDANT WITHOUT BOND AND MOTION FOR CONTINUANCE

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now the United States of America, by and through the United States Attorney for the Western District of Texas, and files this, its Motion to Detain Defendant Without Bond and Motion for Continuance, and for cause, would respectfully show the Court the following:

I.

The Government at this time moves the Court to hold the above-named Defendant without bond pursuant to 18 U.S.C. § 3142(e) and (f). This request is made for the following reasons:

1. The Defendant has violated the terms of supervised release.

2. Title 18 U.S.C. § 3142(e) and (f) directs that the judicial officer shall order a defendant detained, unless the judicial officer finds by clear and convincing evidence that a defendant is not likely to flee or pose a danger to the safety of any person or the community.

3. Pursuant to Federal Rules of Criminal Procedure, Rule 32.1(a)(6), the burden rests with the Defendant to establish by clear and convincing evidence that the Defendant will not flee or pose a danger to any other person or to the community.

The Government would further move the Court for a three-day continuance of the detention hearing from the date of the initial appearance.

WHEREFORE, premises considered, the Government respectfully prays the Court to hold the above-named Defendant without bail pending the final outcome of this case.

Respectfully submitted,

RICHARD L. DURBIN, JR.
UNITED STATES ATTORNEY

BY: [signature]

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